

INTEGRATIVE THERAPEUTICS INC."

NF Formulas PhytoPharmica Tyler Encapsulations Vitaline Formulas

PHYTOPHARMICA'

ENZYMATIC THERADY

9755 SW Commerce Circle, Suite B2 Wilsonville, OR 97070 P: 503.582.8386 F: 503.582.0467

1050

825 Challenger Drive, Green Bay, WI 54311-8328 P: 920.469.1313 F: 888.570.6460 (Enzymatic) P: 920.469.9099 F: 920.469.4418 (Phyto)

16 .

What Better feels like

January 16, 2006

Office of Nutritional Products, Labeling & Dietary Supplements, HFS 810 Center for Food Safety and Applied Nutrition Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740

RE:

Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	<u>STATEMENTS</u>	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Betaine HCl	Supplies acidifying factors and	Betaine Hydrochloride, Pepsin
	proteolytic enzymes necessary for	
	protein digestion and	
	assimilation.*	

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1-16-06

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Michael P. Devereux Chief Operations Officer

9/5 U162 LET 17209